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Attorney for Defendant Todd Quincey Freeman

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD QUINCEY FREEMAN,

Defendant

Criminal Case Number: 08-MJ-0238

**JOINT MOTION TO MODIFY  
CONDITIONS OF RELEASE TO ALLOW  
TRAVEL FROM FEBRUARY 17 – 19,  
2008**

Defendant, by and through his counsel of record and the consent of the government, by and through Assistant U.S. Attorney Carla J. Bressler, moves this Court for an Order approving the following modification of Mr. Freeman's conditions of release:

Mr. Freeman asks this Court to modify the conditions of his release to allow him to travel to Long Beach, California from February 17, 2008 to February 19, 2008 to visit his daughter.

All other conditions of his release will remain the same.

This Motion is based on this pleading, and any and all other oral or written information supplied to the Court upon the hearing of this Motion. Assistant U.S. Attorney Carla J. Bressler and U.S. Pre-Trial Services Officer Dave Horton have been contacted about this motion and neither has any objection.

Dated: February 14, 2008

Respectfully submitted,

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Knut S. Johnson  
Attorney for Defendant Todd Quincey Freeman  
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